

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS
(Eastern Division)

_____)	
In Re:)	
)	
EDGARD VASQUES DEMIRANDA NETO,)	Case No. 16-10026-MSH
)	Chapter 7
Debtor)	
_____)	
)	
SHAMROCK FINANCE, LLC,)	
)	
Plaintiff)	
)	Adversary Proceeding
Vs.)	No. 01077
)	
EDGARD VASQUES DEMIRANDA NETO,)	
)	
Defendants)	
_____)	

**JOINT MOTION TO APPROVE
CERTIFICATION OF CONFERENCE AND WRITTEN
REPORT OUTLINING PROPOSED DISCOVERY PLAN**

Plaintiff Shamrock Finance, LLC and defendant Edgard Vasques DeMiranda Neto hereby ask that this Court approve the proposed discovery plan contained in their Certification of Conference and Written Report Outlining Proposed Discovery Plan, filed herewith. This discovery plan constitutes a change from that set forth in the Court's Pretrial Order dated June 14, 2016.

Respectfully submitted,

SHAMROCK FINANCE, LLC,

By its attorneys,

/s/ James J. McNulty

James J. McNulty, Esq.

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Dated: July 12, 2016

EDGARD VASQUES DEMIRANDA NETO

By his attorney,

/s/ George J. Nader

George J. Nader

BBO #549149

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Dated: July 12, 2016

CERTIFICATE OF SERVICE

I, George J. Nader, hereby certify my understanding that on July 12, 2016, notice of the filing of **Joint Motion to Approve Certification of Conference and Written Report Outlining Proposed Discovery Plan** was sent by the Court, by e-mail, to:

jjm@jjmcnultylaw.com

/s/ George J. Nader
George J. Nader